

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al. v. The Islamic Republic of Iran, et al., 15-cv-9903 (GBD)(SN)

**NOTICE OF RULE 60(a) MOTION FOR
CORRECTION TO PARTIAL FINAL JUDGMENT**

Plaintiff by undersigned counsel moves under Federal Rule of Civil Procedure 60(a) for an order correcting this Court's September 3, 2019 Order of Partial Final Default Judgment on behalf of the Estate of Albert C. Cuccinello (*see* ECF No. 5061) for reasons stated as follows:

1. Plaintiff's counsel conducted extensive quality control before filing its Motion for Entry of Partial Final Default Judgment and has continued its quality control since that time. In so doing, counsel has determined that a certain minor error was contained in the judgment identifying the Estate of Albert C. Cuccinello by the wrong relationship to 9/11 decedent Thelma Cuccinello. In the judgment, Albert C. Cuccinello is identified as the "child" of Thelma Cuccinello whereas Albert C. Cuccinello was the spouse of Thelma Cuccinello.

2. Through the instant Motion, Plaintiff seeks to correct the error as this issue may create potential problems for Plaintiff's enforcing and collecting of said judgment. The modification requested herein does not affect the substantive claims or relief sought. No new claims are asserted, and no additional plaintiffs have been added. Moreover, because the change is insubstantial (and a judgment on behalf of the Estate of Albert C. Cuccinello was already entered and served on Iran putting it on notice of a judgment), no additional service on Iran is required.

WHEREFORE, Plaintiff respectfully requests the issuance of the Corrected Order of Partial Final Default Judgment on behalf of the Estate of Albert C. Cuccinello that is being filed contemporaneously with this motion.

Dated: May 6, 2020

Respectfully submitted,

MOTLEY RICE LLC

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